

CLEARY GOTTlieb STEEN & HAMILTON LLP

NEW YORK

PARIS

BRUSSELS

LONDON

FRANKFURT

COLOGNE

MOSCOW

2112 Pennsylvania Avenue, NW

Washington, DC 20037-3229

T: +1 202 974 1500

F: +1 202 974 1999

clearygottlieb.com

D: +1 202.974.1680
msolomon@cgsh.com

ROME

MILAN

HONG KONG

BEIJING

BUENOS AIRES

SÃO PAULO

ABU DHABI

SEOUL

VIA ECF

April 4, 2022

Hon. Sarah Netburn
United States Magistrate Judge
Southern District of New York
40 Foley Square
New York, NY 10007

RE: SEC v. Ripple Labs Inc. et al., No. 20-cv-10832 (AT)(SN) (S.D.N.Y.)

Dear Judge Netburn:

Defendants Ripple Labs Inc., Bradley Garlinghouse and Christian Larsen (“Defendants”) respectfully submit this response to the SEC’s request for leave to redact portions of handwritten notes by SEC staff (ECF No. 454). While the SEC has submitted unredacted versions of these notes to the Court, Defendants have not had the opportunity to review the redacted portions and accordingly must rely on the SEC’s representations and the Court’s review of the SEC’s submissions as to whether those redacted portions “expressly reflect the authors’ own thinking or reflect deliberations or communications among SEC staff during the meeting.” ECF No. 413 at 8. Provided that they do, and based on the information currently available to them, Defendants do not presently challenge the SEC’s redactions, however, they reserve all rights with respect to these documents, including as to whether any redactions are appropriate given the lack of any specifically-identified deliberative process to which they related.

/s/ Matthew C. Solomon

Matthew C. Solomon
Nowell D. Bamberger
(msolomon@cgsh.com)
CLEARY GOTTlieb STEEN & HAMILTON
2112 Pennsylvania Avenue NW
Washington, DC 20037
+1 (202) 974-1680

*Attorneys for Defendant Bradley
Garlinghouse*

KELLOGG, HANSEN, TODD, FIGEL,
& FREDERICK PLLC
Sumner Square
1615 M Street, NW, Suite 400
Washington, DC 20036
+1 (202) 326-7900

Attorneys for Defendant Ripple Labs Inc.

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019
+1 (212) 373-3000

*Attorneys for Defendant Christian A.
Larsen*

DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, NY 10022
+1 (212) 909-6000